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18 Attorneys for Plaintiff

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22 UNITED STATES OF AMERICA,)	CR No. 08-0164 MHP
23 Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
v.)	EXCLUDING TIME
24 W. SCOTT HARKONEN,)	
Defendant.)	

25 On May 5, 2008, the parties in this case appeared before the Honorable District Court
 26 Judge Marilyn Hall Patel and stipulated that time should be excluded from the Speedy Trial Act
 27 calculations from May 5, 2008 to September 15, 2008, at which time the parties are scheduled to
 appear before Judge Patel for further status conference.

28 The parties represented that granting the continuance was necessary for effective preparation

1 of counsel given the complexity of the case, nature of the prosecution, and voluminous
2 discovery, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(B)(iv).

3 SO STIPULATED:

4 BRIAN J. STRETCH
5 Acting United States Attorney

6 DATED: April 17, 2008

7 /s/
8 IOANA PETROU
9 Assistant United States Attorney

10 DATED: April 17, 2008

11 /s/
12 WILLIAM M. GOODMAN
13 Attorney for W. Scott Harkonen

14 As the Court found on May 5, 2008, and for the reasons stated above, the Court finds that
15 the ends of justice served by the continuance outweigh the best interests of the public and the
16 defendant in a speedy trial and that time should be excluded from the Speedy Trial Act
17 calculations from May 12, 2008 to September 15, 2008 for effective preparation of counsel. See
18 18 U.S.C. §3161(h)(8)(A). The failure to grant the requested continuance would deny counsel
19 reasonable time necessary for effective preparation, taking into account the complexity of the
20 case, nature of the prosecution, and voluminous discovery, and would result in a miscarriage of
21 justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

22 SO ORDERED.

23 DATED: _____

24 Marilyn Hall Patel
25 District Court Judge